

REMARKS

Applicant respectfully requests favorable reconsideration of this application in view of the Remarks presented in the Response of October 5, 2006, and the additional comments submitted herewith.

The Examiner acknowledges that the Burrow patent does not show or disclose, “the use or specific placement of the solid feed means, platforms or doors for allowing the plant to be accessible by operations,...”, and further that Burrow, “does not state where these platforms (access facilities) and doors should be placed in the plant.”

It should be noted further that Burrow at column 5 lines 30-35, specifically teaches that the layout provides direct overhead crane access to as much of the cast house floor and its equipment as is practical. Burrow therefore teaches the provision of a single floor and hence teaches away from the arrangement of the present application. To move from Burrow to the present invention it is necessary to dispense with a single floor arrangement and to substitute it with a two floor arrangement. Whilst this restricts the ability to have overhead crane access to all parts of the end tap floor (as is taught by Burrow), it does allow for greater operational flexibility as workers can operate with greater safety in the end tap floor area whilst the vessel is producing metal and whilst the slag tap and the forehearth are operational (i.e. ejecting molten material). Similarly, it allows maintenance operations on the cast house floor during a slag drain. In particular, it allows personnel to have free access to the whole of the cast house floor during a slag drain (an event that occurs, for example, prior to a lance being changed out) and it allows personnel to have free access to the whole of the end tape floor whilst a slag tap is being performed. Free

access for personnel across the whole of the operational floor is not possible in Burrow when either a slag tap or a slag drain is occurring.

To reiterate, the difference between the two specifications is that the present application takes zones 3 & 4 of Burrow and locates zone 3 directly above zone 4. Zone 2 is also split into two zones, one above the other. This has the effect of increasing the size of zone 1 at the cost of inhibiting direct overhead crane access to the lower floors. This has significant benefits in terms of ancillary plant and equipment that is preferably located in close proximity to the vessel and also reduces the footprint of the slag pits and end tap pits.

Thus, there are significant differences between the two layouts. Burrow does not suggest or provide motivation for the arrangement of the present application and indeed, Burrow teaches away from the arrangement of the present application.

Applicant repeats the request for an interview with the Examiner prior to the next Office Action, in the event that the Applicants' arguments presented in the Response of October 5, 2006, and this Supplemental Response are not deemed to be persuasive with respect to the patentability of the claims.

Should the Examiner believe that any further action is necessary to place this application in better form for allowance; the Examiner is invited to contact Applicants' representative at the telephone number listed below.

The Commissioner is hereby authorized to charge to Deposit Account No. 50-1165 (T2211-9059US01) any fees under 37 C.F.R. §§ 1.16 and 1.17 that may be

required by this paper and to credit any overpayment to that Account. If any extension of time is required in connection with the filing of this paper and has not been separately requested, such extension is hereby requested.

Respectfully submitted,

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